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January 11, 1991

Mr. Brad Shipley
On-Scene Coordinator
U.S. EPA, Region 9
75 Hawthorne Street (H-8-3)
San Francisco, CA 94105

Re: Comments to Administrative Record for the United Heckathorn/Levin-Richmond Terminal Removal Site

Dear Mr. Shipley:

Our firm represents Levin Enterprises, Inc. and the Levin-Richmond Terminal Corporation, the owner and operator, respectively, of the above-described site (the "Site"). We have reviewed the Environmental Protection Agency's administrative record for the Site, and have concluded that it is inadequate, in that it does not include a number of documents, reports and studies which are relevant to the Site and to EPA's decision to issue administrative orders with respect to the Site.

These submittals fall into three categories: (1) those that were submitted to other governmental agencies having jurisdiction over the Site, such as the California Department of Health Services ("DHS"); (2) those that have been produced by EPA, or submitted to EPA or to the National Oceanic and Atmospheric Administration ("NOAA") in connection with the administrative orders issued by EPA with respect to this Site (Order No. 90-22 and Amended Order No. 90-22) (collectively called the "Orders"), or in connection with other aspects of the Site; and (3) certain recently-produced documents which are relevant to the Site.

We are including with this letter copies of all submittals which were made to other government agencies, except for those submittals which were authored by Levine-Fricke, our clients' consultant. Levine-Fricke will send to you under separate cover those submittals which it authored, as well as copies of the recently-produced documents which have not yet been submitted to EPA.

A. Submittals to Other Government Agencies (Copies Attached).

1. Harding Lawson Associates ("HLA") letter to DHS regarding Analytical Results (soil samples) at the Parr Canal site, dated November 20, 1985.

2. HLA report titled "Work Plan For Interim Remedial Measures" dated August 15, 1986; submitted to DHS and the California Regional Water Quality Control Board, San Francisco Bay Region ("RWQCB").

3. HLA report titled "Interim Remedial Action Measures, Train Scale Site Excavation" dated November 4, 1986; submitted to DHS and RWQCB.

4. HLA report titled "Revised Draft Site Characterization Plan" dated November 6, 1986, Volumes I and II; submitted to DHS and RWQCB.

5. HLA report titled "Remedial Action Implementation, Construction Certification, and Post-Remediation Monitoring Plan" for the Parr Canal site, dated February 15, 1989; submitted to DHS and RWQCB.

6. The following documents authored by Levine-Fricke, copies of which are being submitted to the administrative record by Levine-Fricke: reports titled "Sampling and Analysis Plan" and "Quality Assurance Project Plan," both dated October 9, 1989, and a report titled "Health and Safety Plan" dated November 6, 1989, all submitted to DHS, RWQCB, and other state and local agencies; letter to Ted Park of DHS regarding addendum to the Sampling and Analysis Plan, dated November 27, 1989, submitted to DHS, RWQCB, and other state and local agencies; and report titled "Field Data Report" dated February 15, 1990, submitted to DHS, RWQCB, and other state and local agencies.

B. Submittals Previously Given to EPA or NOAA, and Documents Generated by EPA (Copies Not Enclosed).

1. Two letters from Keith Howard of Cooper, White & Cooper to Jerry Clifford of EPA, each dated November 17, 1986, regarding preliminary site inspections prepared by Ecology and Environment.

2. EPA's National Priority List Hazard Ranking System evaluation for the Site.

3. Levine-Fricke letter to EPA commenting on EPA's Hazard Ranking System evaluation for the site, dated December 21, 1989.

4. Letter from Farella, Braun & Martel to Robin Kohn of the U.S. Department of Commerce (for NOAA) and Thomas Clark of the U.S. Department of Justice, dated March 1, 1990.

5. Document titled "Responses of Levin Enterprises, Inc. and Levin-Richmond Terminal Corporation to First Information Request, CERCLA Section 104(e)," submitted by Farella, Braun & Martel to Robin Kohn of the U.S. Department of Commerce (for NOAA) and Thomas Clark of the U.S. Department of Justice, dated March 9, 1990.

6. All correspondence and weekly status reports relating to the Site submitted by Levine-Fricke, Cooper, White & Cooper, Farella, Braun & Martel, Levin-Richmond Terminal Corporation, or Levin Enterprises,Inc. to EPA, whether prior to the issuance of, after the issuance of, or pursuant to, the Orders.

7. All correspondence between EPA and any other potentially responsible parties associated with the Site (other than Levin Enterprises, Inc. and Levin-Richmond Terminal Corporation), including without limitation requests for information, general notice letters, and special notice letters sent by EPA, and any responses thereto received by EPA.

8. Letter from Farella, Braun & Martel to Geoffrey Kors of EPA, dated October 2, 1990.

9. Letter from Farella, Braun & Martel to Geoffrey Kors of EPA, dated October 4, 1990.

10. Levine-Fricke plan for excavating shoreline sediments located below mean high water, dated October 24, 1990.

11. Additional laboratory data provided by Levine-Fricke to EPA on November 21 and November 28, 1990.

12. Levine-Fricke work plan addendum regarding additional excavation and on-site containment of shoreline sediments, dated November 29, 1990.

13. Letter from Farella, Braun & Martel to Geoffrey Kors of EPA, dated December 7, 1990.

C. Documents Recently Produced That Relate to the Site (Copies Being Submitted by Levine-Fricke).

1. Levine-Fricke report regarding pre-excavation and post-excavation sampling work and water quality testing, dated January 11, 1990.

2. Levine-Fricke report titled "Feasibility Study Report" dated January 11,1990.

We expect that all of the above-described material will be added to the administrative record for the Site.

Very truly yours,

COOPER, WHITE & COOPER

Paul M. Kawakami

PMK:gr
Enclosures
A0000945.DOC/PC-43

cc: William Benak (w/o encl.)
Keith Howard (w/o encl.)
Roger Pool (w/o encl.)
Alan Leavitt (w/o encl.)

Harding Lawson Associates

November 20, 1985

8429,003.02

Department of Health Services
Toxic Substances Control Division
2151 Berkeley Way
Berkeley, California 94704

Attention: Mr. Dwight Hoenig

Gentlemen:

Analytical Results
Levin Richmond Terminal Corporation
Parr Canal Site

On behalf of Levin Richmond Terminal Cororation (LRTC), this letter transmits the analytical results of soil samples recently collected by Harding Lawson Associates (HLA) at the Parr Canal site in Richmond, California. HLA's proposal for performing the sampling was presented to you in a letter dated November 6, 1985. That letter also provided responses to your comments on our Site Characterization and Remedial Action Plan dated June 27, 1985, for the Parr Canal.

Ms. Claudia Willen of your staff informed us in a telephone conversation on November 8, 1985, that our proposal for additional soil sampling and chemical analysis was acceptable. In addition, we were informed that our November 6 letter had satisfactorily addressed other DOHS comments regarding the Site Characterization and Remedial Action Plan.

HLA performed the additional soil sampling on November 12, 1985. A backhoe was used to excavate test pits through the locations of Borings E and I. These test pits were logged and sampled by an HLA field geologist. The following presents a description of the materials encountered in each of the pits.

TEST PIT E

Depth	Description
0 to 1.5 feet	Brown Gravelly Sandy Silt (ML) with moderate to abundant metallic debris consisting of pieces of steel plate and pipe.
1.5 to 2.5 feet	Gray to Black Gravelly Sand (SW) with minor metallic debris.
3.5 to 5.5 feet	Yellow-Brown Sandy Gravel (GW).

TEST PIT I

Depth	Description
0 to 1.0 foot	Brown Gravelly Sandy Silt (ML) with occasional pieces of pipe and rubber.
1.0 to 3.0 feet	Gray-Brown to Gray Sandy Gravel (GP) with abundant slabs of concrete and pieces of rubber.
3.0 to 5.0 feet	Brown Gravelly Sandy Clay (CL).

Soil samples from these test pits were composited as follows:

Test Pit E: 1.0, 2.5, 3.0, and 5.5 feet

Test Pit I: 2.0, 3.0, and 5.0 feet

The composite samples were placed in glass jars and delivered to Anatec Laboratory in Santa Rosa, California, where they were analyzed using inductively coupled plasma atomic emission for selected heavy metals. The Anatec Laboratory report is included as an attachment. The results of the analyses are presented below. For comparison purposes, the Total Threshold Limitation Values (TTLC) are also presented. All figures are in parts per million.

	Test Pit E	Test Pit I	TTLC Values
Arsenic	<20	<20	500
Barium	150	200	10,000
Cadmium	<5	<5	100
Chromium	230	60	2,500
Lead	370	120	1,000
Selenium	<50	<50	100
Silver	<10	<10	500

The results of the chemical analyses and visual observations of the test pits indicate that the elevated concentrations of lead encountered during our initial investigation are most likely due to the presence of metallic debris within the fill. We believe that these results should not alter the proposed remedial action plan for this site. We request a written response of your approval for implementing our proposed remedial action plan.

As you know, implementation of the remedial action plan requires a permit from the San Francisco Bay Conservation and Development Commission (BCDC). BCDC has informed us that DOHS approval of the remedial action plan will be necessary before their permit is issued. We therefore request your prompt attention to this matter and that you provide the BCDC with an appropriate approval so they can issue the permit.

We trust that this is the information you require at this time. If you have any questions, please call.

Yours very truly,

HARDING LAWSON ASSOCIATES

William F Frizzell

William F. Frizzell, P.E.
Senior Engineer

WFF/dm

cc: Mr. Bill Benak
cc: Mr. Tom Petersen
cc: Mr. Malcolm Leader-Picone
cc: Mr. Keith Howard
cc: Mr. Nicholas Aracic
cc: Ms. Robin Breuer
cc: Mr. Michael Rugg

ANATEC LABORATORIES INC.

435 Tesconi Circle • Santa Rosa, California 95401 • 707-526-7200

Mr. William Frizzell
Harding-Lawson Associates
7655 Redwood Boulevard
P.O. Box 578
Novato, CA 94948

November 15, 1985
ANATEC Log No: 7350 (1-2)
Series No: 281/017
Client Ref: 8429,003.02

Subject: Metals Content of "Pit E" and "Pit I" Soil Samples Received on November 12, 1985 (HLA Job No. 8429,003.02)

Dear Mr. Frizzell:

This report serves as confirmation of results discussed with you on November 15, 1985. The two samples referenced above were analyzed on an "urgent priority" basis to measure the concentrations of various metals.

The concentrations of the metals were measured using inductively coupled argon plasma atomic emission spectroscopy (ICP). A Perkin-Elmer Model 6500 ICP system was used to make the ICP measurements. The samples were prepared for the ICP analysis using mineral acid dissolution procedures. The digestion and ICP analytical procedures are more fully described in U.S. Environmental Protection Agency (EPA) Method 200.7. The method is contained in "Methods for Chemical Analysis of Water and Wastes," (EPA-600/4-79-020, rev. March 1983).

Results of the testing are summarized in Table 1.

If you have any questions regarding this work, please contact us.

Submitted by:

Susan P. Lange for
William F. Furney
Project Chemist

Approved by:

Stephen Nackord
Stephen F. Nackord
Laboratory Supervisor

/ml

Encl: Chain-of-Custody Records

Table 1. Analytical Results

Parameter	MDL[3] (mg/Kg)	Sample ID & Results (mg/Kg)[1] Test Pit "E" Composite (7350-1)	Test Pit "I" Composite[4] (7350-2)	Recovery (%)[2] Spiked Sample	Method Standard
Arsenic	20	<20	<20/<20	102	108
Barium	10	150	200/210	75	10
Cadmium	5	<5	<5/<5	100	103
Chromium	10	230	59/54	93	97
Lead	50	370	84/170	92	84
Selenium	50	<50	<50/<50	105	104
Silver	10	<10	<10/<10	20	15

[1]Wet weight basis.
[2]Recovery from analyte-fortified aliquot of Test Pit "I" sample, and from method standard. Low recoveries attributed to solubility of barium sulfate and silver chloride in matrix of digestate. Detection limits are not adjusted for recovery data.
[3]MDL--Method detection limit.
[4]Paired results for duplicate analysis of sample.

Harding Lawson Associates

Transmittal/Memorandum

RECEIVED

AUG 21 1986

TINNING & DELAP

To: Levin Metals Corporation
1800 South First Street
San Jose, California 95112

Attention: Mr. William Benak

From: William F. Frizzell
Date: August 20, 1986
Subject: United Heckathorn - Interim Remedial Action
Job No.: 8429,004.02

Remarks: Transmitted herewith is a copy of our Work Plan - Interim Remedial Action Measures, United Heckathorn site, Richmond, California dated August 15, 1986. This Plan was previously submitted to Tom Peterson and has been reviewed by the RWQCB and the DOHS. The agencies have provided the following verbal comments:

- submit a safety plan for the project
- sample residual soils at the final limits of the excavation to document what levels of contaminants will remain
- provide name of contractor to perform the work and location of disposal site
- document all work performed and submit a summary report of interim remedial action by week of October 6, 1986.

Work should begin during the week of August 25. If you have any questions, please call.

cc: Mr. Thomas Peterson
Mr. Malcolm Leader-Picone
Mr. Keith Howard
Mr. Nicholas Aracic

A Report Prepared for

Levin-Richmond Terminal Corporation
402 Wright Avenue
Richmond, California 94804

WORK PLAN FOR INTERIM REMEDIAL ACTION MEASURES UNITED HECKATHORN SITE RICHMOND, CALIFORNIA

HLA Job No. 8429,004.02

by

William F. Frizzell
Civil Engineer

James C. Davies
Principal Engineer

Harding Lawson Associates
7655 Redwood Boulevard, P.O. Box 578
Novato, California 94948
415/892-0821

August 15, 1986

INTRODUCTION

This report presents a work plan for interim remedial action measures at the United Heckathorn site in Richmond, California. This remedial action is being undertaken to mitigate the presence of elevated levels of chlorinated pesticides and organic solvents in what is believed to be a relatively confined area of the site.

During the week of July 21, 1986, Levin-Richmond Terminal Corporation (LRTC) began excavation for the construction of a train scale located within the former United Heckathorn site. The train scale construction proposal was presented to the regulatory agencies in a letter dated April 21, 1986 outlining the details of construction and the location of the scale. To a point of excavating approximately 4 to 5 feet above the water table, an odorous, oily liquid seeped from the side wall of the excavation into the bottom. In the attempt to contain the oily liquid, a hole was advanced below the water table into the bay mud. The construction was terminated at that time until a determination could be made as to the source and composition of the liquid. LRTC subsequently contacted EAL Corporation to sample and analyze the liquid; their analysis identified the following components:

Component	Concentration (ppm)
DDT	400,000
Chlorobenzene	20
Ethyl benzene	1,800
Acetone	660
Xylene	12,000
DDD	1,200
Endrin	93

Harding Lawson Associates (HLA) later collected a soil sample from the zone of visible contamination within the excavation. The soil sample contained the following contaminants:

Component	Concentration (ppm)
DDT	2,300
DDD	1,500
Xylene	28
Ethyl benzene	0.11

Analysis for purgeable halocarbons detected none of those parameters.

Based on field observations and the results of the chemical analyses, it appears that this location may have been subject to a past spill which resulted in a localized area of high contamination by both organic solvents and chlorinated pesticides. The fact that a monitoring well (B30) near this location has not shown levels of these solvent contaminants above 10 ppb indicates that significant effects of the spill have remained localized. In addition, this area of the site was found to contain no free ground water in the fill above the bay mud. Thus, ground-water flow in this area essentially nonexistent in the area above the bay mud. Based on our previous field investigation, the ground-water elevation at this location was found to vary between 0.2 to 1.2 feet above Mean Sea Level (MSL). The top of the bay mud in this area is at 4.6 feet MSL. The hydrocarbon contamination within the excavation was found at about 5 to 6 feet MSL, above the water table. Previous investigations have indicated that this area is not under tidal influence, and there appears to be no direct connection to the adjacent Lauritzen Canal.

INTERIM REMEDIAL ACTION PLAN

General Objectives

The objectives of implementing an interim remedial action plan at the site are as follows:

1. To remove soils contaminated with organic solvents
2. To remove the contaminated ground water generated by the mingling of the solvent/pesticide mixture and the ground water within the excavation area
3. To ensure that the area is contaminant-free so that construction of the train scale may proceed.

Implementation of the interim remedial action plan will be performed by a contractor experienced in hazardous waste earthwork, and all appropriate health and safety measures will be employed during this operation. This will include the wearing of chemical protective clothing and air-purifying respirators with organic vapor cartridges, and on-site monitoring using an organic vapor analyzer (OVA).

Removal of Contaminated Soil

Contaminated soils within the excavation area are discolored and exhibit a strong solvent odor. After stripping off the uncontaminated surface soils, contaminated soils will be excavated until all discolored material has been removed. Soil samples will then be collected from the side walls and bottom of the excavation, placed in glass jars covered with aluminum foil, and head-space readings made with an OVA. Excavation will continue until head-space measurements do not exceed ambient background levels.

If excessive amounts of discolored soils are encountered, an assessment of the removal program will be made. At that time, an evaluation will be made to continue excavation or incorporate the residual contamination into the final remedial action plan for the site.

Excavated soil will be disposed of at a permitted hazardous waste facility. The uncontaminated overburden will be returned to the excavation. All soil removal activities will be observed by an HLA representative, who will perform all sampling and monitoring.

Removal of Contaminated Ground Water

During excavation of the contaminated soils, it is anticipated that additional liquids from the sides of the excavation may seep into the excavation and mingle with the ground water. The ground water will be pumped out as the excavation proceeds to ensure that liquids flowing into the excavation are removed. The extent of ground-water pumping will depend on the limits of the soil excavation and will be limited to removal of those liquids that accumulate in the hole.

All ground water pumped from the excavation will be removed from the site and handled as hazardous waste. At the present time, a hazardous waste hauler and disposal site have not been selected. LRTC is currently awaiting final approval from at least two disposal sites to receive these materials. Once a disposal site has been selected, all appropriate agencies will be notified.

SCHEDULE

It is anticipated that this work will begin during the fourth week of August 1986 and will require approximately two days to complete. The hauling of materials to a disposal site will depend on the disposal facility's waste approval process and may take two weeks or more to complete. If excavated material must be stockpiled, pending receipt of approval from the disposal site, it will be placed in a secured area and covered with an impermeable membrane to prevent human contact and the release of organic vapors.

DISTRIBUTION
WORK PLAN FOR INTERIM
REMEDIAL ACTION MEASURES
UNITED HECKATHORN SITE
RICHMOND, CALIFORNIA
August 18, 1986

COPY NO. 5

		Copy No.
2 copies:	Levine-Richmond Terminal Corporation 402 Wright Avenue Richmond, California 94804 Attention: Mr. Thomas Peterson	1 - 2
1 copy:	California Regional Water Quality Control Board 1111 Jackson Street, Room 6040 Oakland, California 94607 Attention: Robin Breuer	3
1 copy:	California Department of Health Services 2151 Berkeley Way Berkeley, California 94704 Attention: Claudia Willen	4
1 copy:	Job File	5
1 copy:	QC/Bound Report File	6

WFF/JCD/dm

QUALTIY CONTROL REVIEWER

Robert S. Lyon FOR
John C. Blasco
Associate Waste Management Specialist